

464 East Third Ave.  
Chico, CA 95926  
August 24, 2000

**FISH AND WILDLIFE  
SERVICE**

SEP 01 2000

**RECEIVED  
VENTURA, CA**

Greg Sanders  
U.S. Fish and Wildlife Service  
Ventura Fish and Wildlife Office  
2493 Portola Road, Suite B  
Ventura, CA 93003

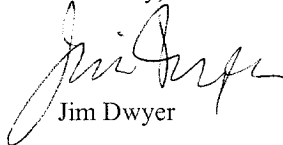
Dear Mr. Sanders:

Thank you for the opportunity to comment on the proposed translocation of sea otters. I was unable to attend the public meetings being held in Santa Barbara and Monterey and am concerned that limiting the meetings to those two locations may have skewed the audience strongly in favor of commercial fishing interests. Those without an immediate financial interest may have been less likely to be able to attend. That includes scientists, environmentalists, and people like me who travel to Point Lobos once or twice a year specifically for otter watching. In Monterey I spend money on motels, restaurants, gifts, and gas, much like the many other otter watchers. Maintaining a healthy otter population makes sense not only for environmental reasons, but also for long-term economic ones. No otters? No thanks, Monterey. As far as predation of abalone and other shellfish is concerned, I strongly suspect that poaching, overharvesting, and disease are far greater threats than otters. Until the fishing industry itself takes a far more active role in stopping shellfish poaching and over-harvesting they lack credibility on this issue.

Sea otters do not recognize artificial political boundaries, but they can and do recognize appropriate habitats. The whole concept of a "no otter zone" would be merely ludicrous, a little like calling a beach a "no water zone," if it were not so environmentally destructive. The no otter zone and translocation to Saint Nicholas Island have failed. The Fish and Wildlife Service is absolutely correct in its "Biological Opinion" that its first responsibility is in the protection of the species. That's a good start, and I encourage you to be guided by that mandate and by scientific evidence, not by economic pressure other than the "pressure" to spend taxpayer money in a cost-effective way to meet conservation goals. Logic suggests that all artificial translocations end, including removing any of the remaining otters from San Nicholas Island. After all, they are likely to simply return to their new homes. The irony of even more otters dying on the back end of a failed effort to protect them is quite troubling.

I strongly support the efforts of the USFWS to protect otter populations. If there is anything I can do to help you, please don't hesitate to ask.

Sincerely,



Jim Dwyer